

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

RE: Jamie W Maher,
Tanya R Maher

) CASE NO. 18-22394
) Judge Pamela S. Hollis

AGREED REPAYMENT AND DEFAULT ORDER

THIS CAUSE COMING TO BE HEARD on the Motion of Freedom Mortgage Corporation, the mortgagee on the property located at 2510 Lyman Loop, Yorkville, IL 60560, the Court having jurisdiction and being duly advised in the premises, and due notice having been given to the parties entitled thereto;

IT IS HEREBY ORDERED:

1. The Debtors acknowledge a default to Freedom Mortgage Corporation of \$2,576.79 through April 2019, after crediting the tender of payments made through April 17, 2019. The aforementioned default is calculated as follows:

January 2019 through April 2019 = 4 @ \$1,783.28	\$7,133.12
Bankruptcy fees and costs	\$1,031.00
Less funds previously tendered	(\$4,088.09)
Less funds in suspense	(\$1,499.24)
Total default amount remaining	\$2,576.79

The Debtors shall tender the following payments on or before the following dates:

On or before	May 1, 2019	One post-petition mortgage payment +	\$429.47
On or before	June 1, 2019	One post-petition mortgage payment +	\$429.47
On or before	July 1, 2019	One post-petition mortgage payment +	\$429.47
On or before	August 1, 2019	One post-petition mortgage payment +	\$429.47
On or before	September 1, 2019	One post-petition mortgage payment +	\$429.47
On or before	October 1, 2019	One post-petition mortgage payment +	\$429.44

2. The current post petition mortgage payment is \$1,783.28, which may change due to adjustable interest rates, escrow requirements, or other similar matters as applicable.

Payments are to be sent to Freedom Mortgage Corporation Cash Management, 10500 Kincaid Drive, Suite 300, Fishers, IN, 46037.

3. If the Debtors default in making any payment under paragraph one, then the Stay shall automatically Modify to Freedom Mortgage Corporation without further Court Order.
4. Commencing with the November 2019 post-petition mortgage payment and continuing thereafter, if the Debtors fail to make the payment by the due date, thereby accruing a two months post-petition mortgage payment default, then the Stay shall Modify to Freedom Mortgage Corporation without further Court Order, if upon notice to the Debtors and their attorney the complained of default is not fully cured and proof of cure received by Freedom Mortgage Corporation's attorney, McCalla Raymer Leibert Pierce, LLC, 1 N. Dearborn St., Suite 1200, Chicago, IL 60602 within 14 days from the date notice is sent.
5. If the Stay is Modified to Freedom Mortgage Corporation, or its successors and assigns, as outlined in this Order, counsel for the mortgage company shall give notice to the Debtors, the Debtors' attorney, and the Trustee, and file said notice with the Court.
6. In the event that McCalla Raymer Leibert Pierce, LLC should have to send out any Notices of Default under this Order, the Debtors shall pay an extra \$100.00 per Notice in certified funds to Freedom Mortgage Corporation in addition to the funds needed to cure the default cited in the Notice. These \$100.00 payments constitute attorney's fees and must be paid within the same 14-day cure period listed in paragraph four of this Order or the Stay shall Modify.

Dated: _____ Entered: _____
Bankruptcy Judge Pamela S. Hollis

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